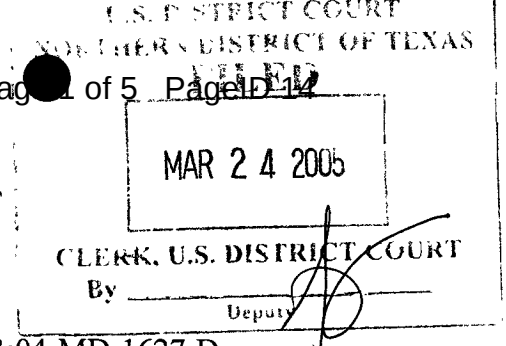


ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



IN RE AMERICAN AIRLINES, INC.
PRIVACY LITIGATION

§ Master File No. 3:04-MD-1627-D
§
§
§ This Document Relates To:
§ Civil Action No. 3:04-CV-0750-D
§ Civil Action No. 3:04-CV-1148-D
§ Civil Action No. 3:04-CV-2564-D

**PLAINTIFF'S RESPONSE TO COURT'S
ORDER DATED MARCH 18, 2005**

Plaintiffs Bruce Kimmell, Erica Baldwin and Michael Rosenberg ("Plaintiffs"), by and through their undersigned counsel, respectfully submit the following response to the Court's Order dated March 18, 2005 regarding the modification of the class definition in the above-referenced consolidated action (the "Order"). [Docket Entry No. 4].

1. On March, 18, 2005, the Court entered the Order, in which the Court advised the parties that certain of the Court's family members, including his wife, may be members of the putative class Plaintiffs seek to represent in this action, and that, as currently defined, the proposed class definition does not exclude these individuals, although the Court, himself, is specifically excluded.

2. The Order required Plaintiffs to advise the Court, within 20 days of the Order, as to whether Plaintiffs are willing to modify the definition of the class to exclude not only the Court, but the Court's wife, persons within the third degree of relationship with the Court and his wife,¹ and the spouses of such persons.

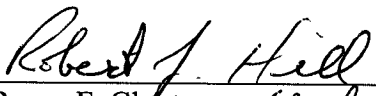
¹ Pursuant to Canon 3.C(3)(a) of the Code of Conduct for United States Judges, "third degree of relationship" means parent, child, grandparent, grandchild, great grandparent, great grandchild, sister, brother, aunt, uncle, niece and nephew, including whole and half blood relatives and most step relatives.

3. Plaintiffs have reviewed and considered the Order. Plaintiffs will modify the definition of the putative class to specifically exclude the following individuals: the Court, the Court's wife, all persons within the third degree of relationship to the Court and his wife, and the spouses of all such persons.

4. Accordingly, Plaintiffs do not believe that it is necessary for the Court to further consider recusal in this matter in light of the amendment of the Class definition.

Dated: March 24, 2005

Respectfully submitted,


Roger F. Claxton (RFC By Permission)
State Bar No. 04329000
Roger J. Hill
State Bar No. 09652100
CLAXTON & HILL, PLLC
3131 McKinney Ave., Suite 700
Dallas, Texas 75204
Tel. (214) 969-9029
Fax (214) 953-0583

**Local Counsel for Plaintiffs Bruce Kimmell
and Michael Rosenberg**

J. Derek Braziel
EDWARDS & GEORGE, LLP
208 N. Market Street, Suite 400
Dallas, Texas 75202
Fax: (214) 749-1400

Local Counsel for Plaintiff Erica Baldwin

OF COUNSEL:

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

Robert M. Rothman
Samuel H. Rudman
200 Broadhollow Road, Suite 406
Melville, New York 11747
(631) 367-7100

-and-

Paul J. Geller
Stuart A. Davidson
197 South Federal Hwy., Suite 200
Boca Raton, Florida 33432
(561) 750-3000

Attorneys for Plaintiff Bruce Kimmell

MURRAY, FRANK & SAILER LLP
Eric J. Belfi
275 Madison Avenue, 8th Floor
New York, New York 10016
Fax: (214) 682-1818

REINHARDT WENDORF & BLANCHFIELD
Garrett D. Blanchfield, Jr.
1250 East First National Building
332 Minnesota Street
St. Paul, Minnesota 55101
Fax: 651-287-2103

Attorneys for Plaintiff Erica Baldwin

MILBERG WEISS BERSHAD &
SCHULMAN LLP
Michael M. Buchman
J. Douglas Richards
One Pennsylvania Plaza
New York, New York 10119-0165
Telephone: (212) 594-5300

ABRAHAM, FRUCHTER & TWERSKY LLP

Jack G. Fruchter

One Penn Plaza, Suite 1910

New York, New York 10119

Telephone: (212) 279-5050

Attorneys for Plaintiff Michael Rosenberg

CERTIFICATE OF SERVICE

This will certify that on the 24 day of March, 2005, I served a true and correct copy of the foregoing by United States Mail on the following counsel for defendants:

Dee J. Kelly, Sr.
Brian S. Stagner
KELLY HART & HALLMAN
201 Main Street, Suite 2500
Fort Worth, Texas 76102-3194
Fax: (817) 878-9280

Michael V. Powell
LOCKE LINDELL & SAPP LLP
2200 Ross Avenue, Suite 2200
Dallas, Texas 75201-6776
Fax: (214) 756-8520

**Counsel for Defendants AMR Corp. and
American Airlines, Inc.**

Gordon K. Wright
COOPER & SCULLY
900 Jackson, Suite 100
Dallas, Texas 75202
Fax: (214) 712-9540

**Counsel for Defendant Fair, Issac &
Company, Inc.**

Allan W. Harris
PIPER RUDNICK
1717 Main Street, Suite 4600
Dallas, Texas 75201-4605
Fax: (214) 743-4545

**Counsel for Defendant Lockheed Martin
Corporation**

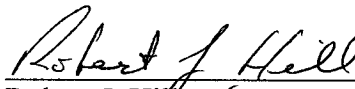
Thomas A. Graves
MCKOOL SMITH
300 Crescent Court, Suite 1500
Dallas, Texas 75201
Fax: (214) 978-4044

David A. Clark
David H. Coburn
STEPTOE & JOHNSON
1330 Connecticut Ave. N.W.
Washington, DC 20036
Fax: (202) 429-3902

**Counsel for Defendant Airline Automation,
Inc.**

Gary Clark Crapster
STRASBURGER & PRICE
P.O. Box 50100
901 Main Street, Suite 4300
Dallas, Texas 75250-0100
(214) 651-4330

**Counsel for Defendant Infoglide Software
Corporation**


Robert J. Hill (RFC by permission)